

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF ALABAMA, NORTHERN DIVISION**

**JEFFREY ALAN FLORREICH,**

**Plaintiff,**

**v.**

**VICTORIA LYNNE MEISTER, et. al.,**

**Defendant.**

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**Civil Action No. 3:06cv442-MHT  
(Tallapoosa County Case No.  
CV-06-47)**

**REPORT OF PARTIES' PLANNING MEETING**

- I. Pursuant to Fed. R. Civ. P. 26(f), a meeting was held on June 13, 2006, via telephone conference and was attended by:

Michael L. McKerley for Plaintiff, Jeffrey Alan Florreich  
Alex L. Holtsford, Jr. and Susan Dehghani-Sanich for Defendant, Victoria Lynne Meister

II. Pre-Discovery Disclosures

The parties will exchange initial disclosures required by Fed. R. Civ. P. 26(a)(1) within twenty-one days after the scheduling order has been entered.

III. Discovery Plan

The parties jointly propose to the Court the following discovery plan:

- a. All discovery commenced in time to be completed by March 26, 2007;
- b. Maximum of 40 interrogatories by each party to the other party; response are due 30 days after the scheduling order had been entered.
- c. Maximum of 30 requests for production of documents by each party; responses are due after the scheduling order had been entered.
- d. Maximum of 30 requests for admissions by each party to the other party; responses due after the scheduling order had been entered.
- e. Maximum of 10 depositions by Plaintiff and 10 depositions by Defendants.
- f. Each deposition will not exceed four hours unless agreed to by the parties.
- g. Reports from retained experts under Rule 26(a)(2) due:

From Plaintiff	:	November 6, 2006
From Defendants	:	December 6, 2006

IV. Other Items

- a. Parties do not request a conference with the Court before entry of the scheduling order;
- b. The parties request a pretrial conference on April 9, 2007.
- c. Plaintiffs will be allowed until August 21, 2006, to join additional parties and until August 21, 2006, to amend pleadings.
- d. Defendants shall be allowed until October 6, 2006, to join additional parties and until September 21, 2006, to amend pleadings.
- e. All potentially dispositive motions should be filed by February 6, 2007.
- f. Final list of witness and exhibits under Rule 26(a)(3) should be due:

Witness List between parties - April 16, 2007

Plaintiff's expert witness - October 9, 2006

Exhibits between parties - April 16, 2007

Defendant's expert witness - December 11, 2006

- g. Parties shall have ten (10) days after service of final list of witnesses and exhibits to list an objection under Rule 26(a)(3).
- h. The case should be ready for trial by May 7, 2007, and is expected to take approximately 2 days.

Dated: June 15, 2006

/s/ Michael L. McKerly

MICHAEL L. MCKERLY

Attorney for Plaintiff, Jeffrey Alan Florreich

OF COUNSEL:

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/s/ Alex L. Holtsford, Jr.

S/ ALEX L. HOLTSFORD, JR. (HOLT9586)

S/ SUSAN DEHGHANI- SANICH (DEHGS0677)

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